

From: Calloway-Durham, Sonya
Sent: Tuesday, March 21, 2023 10:50 AM
To: Daixi Xu <DAIXIX@ncpls.org>
Cc: Carcioppolo, Lauren <LCarcioppolo@ncdoj.gov>; Trachtman, James <jtrachtman@NCDOJ.GOV>
Subject: RE: Abrams

Hey,

I'm not sure how to take your "instructions." However, please do what you feel is best for your client, and I will do the same. In the meantime, we will continue working toward the goal of getting the unredacted documents/additional information to you by Monday. Thanks again.

From: Daixi Xu <DAIXIX@ncpls.org>
Sent: Tuesday, March 21, 2023 10:24 AM
To: Calloway-Durham, Sonya <SCALLOWAY@ncdoj.gov>
Cc: Carcioppolo, Lauren <LCarcioppolo@ncdoj.gov>; Trachtman, James <jtrachtman@ncdoj.gov>
Subject: RE: Abrams

Hi Sonya,

Thanks for keeping in mind my discovery deadline. Monday is fine for additional document productions. I will also expect supplemental responses to the written discovery for any new disclosures by Monday, including new verifications for any supplemental interrogatory responses. Any outstanding issues that exist by Monday will be the subject of a motion to compel.

Thanks,
Daixi

From: Calloway-Durham, Sonya <SCALLOWAY@ncdoj.gov>
Sent: Tuesday, March 21, 2023 10:04 AM
To: Daixi Xu <DAIXIX@ncpls.org>
Cc: Carcioppolo, Lauren <LCarcioppolo@ncdoj.gov>; Trachtman, James <jtrachtman@ncdoj.gov>
Subject: RE: Abrams

Good morning Daixi,

My client is working as we speak, to gather some of the additional information. I'm still waiting on a response regarding some of your questions.

The bigger issue is that Lauren has to be out for a family matter on Friday, which means she will not have time to finalize and send the documents to you by Friday. In addition, she has the ShareFile license. However, Lauren feels certain she can make it happen on Monday.

I understand the deadline for discovery ends on the 3rd and am sensitive to your time needs to have the documents sooner rather than later. I just wanted to let you know as soon as I knew, there would be an issue with Friday. As always, thank you for your patience and consideration.

From: Daixi Xu <DAIXIX@ncpls.org>
Sent: Monday, March 20, 2023 2:03 PM
To: Calloway-Durham, Sonya <SCALLOWAY@ncdoj.gov>
Cc: Carcioppolo, Lauren <LCarcioppolo@ncdoj.gov>; Trachtman, James <jtrachtman@ncdoj.gov>
Subject: RE: Abrams

Hi Sonya,

Thanks for the update, and I look forward to hearing from you.

Daixi

From: Calloway-Durham, Sonya <SCALLOWAY@ncdoj.gov>
Sent: Monday, March 20, 2023 2:02 PM
To: Daixi Xu <DAIXIX@ncpls.org>
Cc: Carcioppolo, Lauren <LCarcioppolo@ncdoj.gov>; Trachtman, James <jtrachtman@ncdoj.gov>
Subject: RE: Abrams

Hi Daixi,

Thanks so much for your response. I am just returning to the ofc today, and will let you know as soon as possible, what if, any issues remain to be resolved. However, in the meantime, we will try to get anything not disputed to you by Friday, the 24th, with the understanding that you agree to the language in my March 9th ltr. Thanks again.